

REMARKS

Upon entry of this Response, claims 1-10, 12-34, 48-51, 53-58, and 69-71 remain pending in the present patent application. Claims 1, 8, 18, 28 and 69 have been amended herein. Applicants respectfully request reconsideration of the pending claims in view of the following remarks. In addition, Applicants re-allege and reiterate all remarks made in the response to the Office Action of April 29, 2008 in order to preserve those arguments for appeal, should an appeal become necessary.

I. REPLY TO "RESPONSE TO AMENDMENT" SECTION OF OFFICE ACTION

With respect to the Third Declaration of Charles Pennington submitted with the response to the Office Action of April 29, 2008, in item 2 of the Office Action it is set forth underneath a heading of "Response to Amendment" as follows:

"Declarations refer(s) to economical aspects of invention, to the system described in the above referenced application but not to the individual claims of the application. Declarations fail to persuade because the Declaration does not even attempt to discuss detailed claim language and its relation to the specific rejections of record. Instead, said Declaration appears to be an implicit summary dismissal of the analysis of claim language."

Applicants respectfully disagree. Applicants wish to point the attention of the Examiner to at least items 8-10 of the Third Declaration of Charles Pennington, which note specific advantages of the design of the claimed invention relative to the prior art. More specifically, a design in accordance with the claims can result an increase of the amount of spent nuclear fuel that can be stored.

The Office Action additionally maintained its contention that the evidence submitted in the First and Second Declarations of Charles Pennington is not relevant to the scope of the claims. In the response to the Office Action of April 29, 2008, Applicants specifically requested an explanation as to how the objective evidence is not commensurate with the scope of the claims given that the subject matter of the affidavit submitted is directly relevant to the rejections of the claims, *etc.* However, the Office Action merely states that the Declarations cannot have the same effect as a Declaration from a neutral party, because Declarant's current employment is connected with the assignee of the instant application (NAC International, Inc.). However, the Office Action fails to address the merits of the Declaration as well as give an explicit explanation as to how the First, Second and Third Declarations fail to relate to the instant claims. Applicants remind the Examiner that Declarations are submitted before the USPTO under Section 1001 of Title 18 of the United States Code, and that the Declarant's connection with the assignee does not render the entire declaration ineffective such that it is not entitled to an objective consideration during Examination.

Additionally, Applicants reiterate and re-allege statements made in the Office Action of April 29, 2008 with respect to the First and Second Declaration of Charles Pennington in order to preserve arguments made therein for appeal.

II. REPLY TO “RESPONSE TO ARGUMENTS” SECTION OF OFFICE ACTION

With respect to Applicants’ arguments submitted in the response to the Office Action of April 29, 2008, the Office Action maintains its objection the drawings and Specification as well as the rejection of the of the claims under 35 U.S.C. § 112. Applicants reiterate and re-allege statements made in the response to the Office Action of April 29, 2008 concerning, *inter alia*, the fact that the drawings are not necessarily to scale, but are submitted with the application merely to demonstrate the concepts discussed therein.

Additionally, the Office Action maintained its contention that “advantages of detachable connection of cylinders with using well-known recesses cylinder (*sic*) attachments and barrel hinge relative welding used in Loftis patent are obvious for ordinary skill in the art in time of invention.” Accordingly, Applicants reiterate and re-allege statements made concerning this contention that were made in the Office Action of April 29, 2008 in order to preserve those arguments for appeal.

III. REPLY TO THE OBJECTION TO THE DRAWINGS

In item 6 of the Office Action, the drawings have been objected to under 37 C.F.R. § 1.83(a). To this end, the Office Action states as follows:

6. The drawings are objected to under 37 CFR 1.83(a). The drawings must show every feature of the invention specified in the claims. Therefore, the limitation of claim 7, “the plurality of tubes includes a plurality of flat load bearing surfaces at the corners of respective ones of the tubes, the flat load bearing surfaces of the first one of the tubes engaging the plurality of flat bearing surfaces on the second one of the tubes” must be shown or the features canceled from the claims (see claims 7, 17, 27 and 28). Regarding said limitation: as can be seen in FIG. 5, connection of rod 8, 12 with rod 20, 22 by pin cannot connect flat

bearing surfaces of corners 60 and 62 together as claimed in claims 7, 17, 27 and 28 and as shown in FIG. 9. No new matter should be entered.

Office Action, page 5.

Applicants respectfully disagree. Specifically, FIGS. 8 and 9 show how flat load bearing surfaces come together at corners of the respective ones of the tubes. To the extent that such a configuration appears to be incompatible with the use of the pins or rods as described in the Office Action as set forth above, Applicants respectfully assert that the drawings illustrate the principle of flat surfaces coming together. It is understood that the drawings of the rods and recesses as set forth in FIG. 5 are not necessarily to scale. To this end, reference is made to paragraph [0012] of the present specification which states:

The disclosed apparatus and methods can be better understood with reference to the following drawings. The components in the drawings are not necessarily to scale.

Accordingly, the drawings of the present application are provided to illustrate the various aspects of the claimed embodiments, but are not working drawings that provide specific dimensions of the components displayed. ***To this end, drawings in patent applications are not working drawings, but instead generally describe the principles illustrated therein. Accordingly, it is improper to base arguments upon visual measurement of the drawings relative to each other. See In re Wright, 193 USPQ 332 (CCPA 1977); In re Chitayat, 408 F2d 475, 161 USPQ 224 (CCPA 1969).***

Applicants assert that it appears that the Office Action has recited the objection to the drawings with respect to claims 7, 17, 27, and 28 by performing a visual comparison of the drawings as if they relayed precise measurements of the components described. Applicants respectfully assert that such a comparison is improper. Further,

Applicants assert that one skilled in the art will understand that the various components will be sized such that flat load bearing surfaces at the corners may come together and that the same corners may also accommodate recesses and rods as described herein. To this end, one skilled in the art understands that the flat load bearing surfaces are longitudinally offset with respect to the recesses and rods. Furthermore, the discussion of FIGS. 8 and 9 describes bringing the flat load bearing surfaces together when the respective tubes are “linked together,” which refers to the fact that such tubes are connected by virtue of the rods and pins as described therein. Applicants assert that it is clearly apparent to one skilled in the art that the rod and pin linkages maintain the load bearing surfaces on abutting tube corners in the appropriate geometric positions for interaction.

Accordingly, Applicants assert that the objection to the drawings is improper. Therefore, Applicants respectfully request that the objection to the drawings be withdrawn.

IV. REPLY TO OBJECTION UNDER 35 U.S.C. § 112, FIRST PARAGRAPH, ALLEGING A LACK OF ENABLEMENT

In items 7-8, the Office Action maintained its rejection made in the Office Action of April 29, 2008 with regard to its allegations that the application fails to comply with the enablement requirement of 35 U.S.C. § 112. Accordingly, Applicants reiterate and reallege the statements made in the response to the Office Action of April 29, 2008 in order to preserve those arguments for appeal.

V. REPLY TO REJECTION UNDER 35 U.S.C. § 112, SECOND PARAGRAPH, ALLEGING INDEFINITENESS

In items 9-12 and 14, claims 7, 17, 27, and 28 have been rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. In particular, the Office Action maintains the same rejection alleged in the Office Action of April 29, 2008. Accordingly, Applicants reiterate and re-allege the statements made in the response to the Office Action of April 29, 2008 in order to preserve those arguments for appeal. Applicants respectfully assert that the scope of the claims is clear to one possessing ordinary skill in the pertinent art. In particular, the elements outlined above in the Office Action are clear to the extent that they interrelate with the other elements of the claims in which they appear. To this end, Applicants respectfully assert that one skilled in the art can understand the “metes and bounds” of the claims.

In addition, while the Office Action again alleges that elements of the claims result in the metes and bounds of the claimed invention not being defined, Applicants respectfully assert that the Office Action again fails to explain precisely how this is the case. Accordingly, Applicants respectfully request that either a proper explanation be provided as to how the above identified elements render the respective claims indefinite, or that the rejection of claims 7, 17, 27 and 28 be withdrawn.

In items 12 and 13, the Office Action alleges that claims 1, 3-10, 13-34, 48-51, 53-58, and 69-71 are rejected under 35 U.S.C. § 112, second paragraph as indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. More specifically, the notes that in claims 1, 8, 18, and 28, the

preamble discloses “a container” and thusly the preamble is a subcombination of the device because the bodies of the various claims disclose “the combination of container and spent fuel assemblies.” Applicants respectfully disagree. A container of claim 1 (and various other claims) can require a plurality of tubes disposed within said container. In other words, it is clear that the “container” as noted in the preamble of claim 1 does not refer to the plurality of tubes required in the body of the claim. Applicants wish to note that Applicants have the right to craft the claims of the application as it sees fit in order to define the invention.

The Office Action further alleges that above noted “inconsistency” raises the question regarding the claim recites a combination or a subcombination. In addition, the Office Action alleges that there is insufficient antecedent basis for the “limitation that is directed to the combination rather than the subcombination because the nuclear fuel (rods, assemblies) is not an inherent component of the container.” Applicants respectfully disagree. Applicant requests an explanation as to how the claim language referenced in the above noted rejection under 35 U.S.C. § 112 gives rise to an ***antecedent basis*** issue, as the claim element “nuclear fuel assemblies” is properly introduced in the first element of claim 1 (and subsequent independent claims) and does conflict with other elements of the claim.

VI. IMPROPER USE OF NONANALOGOUS REFERENCES TO REJECT CLAIMS UNDER 35 U.S.C. § 103(a)

Next, with reference to item 18 claims 8-10, 13-34, 48-51 and 53-58 have been rejected under 35 U.S.C. § 103(a) as allegedly being obvious over US Patent 6,009,136 issued to Loftis et al. (hereafter “*Loftis*”) in view of IP WO 00/72326 issued to Minshallet

(hereinafter "*Minshalet*") and in view of the online publication by Hoover Fence Co. (Hoover Fence Company Catalog, Newton Falls, Ohio, June 1999, hereafter "*Hoover Fence*"). Further, claims 8-10, 13-34, 48-51, and 53-58 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Loftis* in view of *Minshall*; in view of *Bosshard*; in view of *Lindsay* and in view of *Hoover Fence*.

Applicants respectfully assert that each of these rejections is improper as both rejections employ nonanalogous art. In particular, *Lindsay* and *Hoover Fence* present nonanalogous art that is improperly implied in the rejection of the claims of the present application. As Applicants have previously addressed this issue in its response to the Office Action of April 29, 2008, Applicants reiterate and re-allege those remarks in order to preserve its argument for appeal.

VII. REJECTION OF CLAIMS 1, 3-6, 7 and 69-71 AS ALLEGEDLY BEING UNPATENTABLE UNDER 35 U.S.C. § 103(a) OVER LOFTIS IN VIEW OF MISHALLET IN VIEW OF HOOVER FENCE

As stated above, claims 1, 3-6, 7 and 69-71 have been rejected under 35 U.S.C. § 103(a) as being obvious over *Loftis* in view of *Minshall* in view of *Hoover Fence*. A prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the claims. MPEP §2143.03, In re Rijckaert, 9 F.3d 1531, 28 U.S.P.Q2d 1955, 1956 (Fed. Cir. 1993). In addition to the above arguments that the rejection of these claims is improper due to the use of nonanalogous art, Applicants respectfully assert that the cited combination of references fails to show or suggest each element of claims 1, 3-6, 7 and 69-71. Accordingly, Applicants respectfully request that the rejection of these claims be withdrawn.

To begin, claim 1 recites as follows:

1. A container for storing or transporting spent nuclear fuel, the container comprising:

a plurality of tubes that receive spent nuclear fuel assemblies, each tube having four sidewalls and four corners defining a rectangular cross section, ***the four sidewall forming a continuous interior sidewall***;

an attachment means for attaching respective pairs of a plurality of corners of the tubes to each other, at least one corner of a first one of the tubes engaging another corner of a second one of the tubes, the attachment means comprising a plurality of recesses in respective ones of the corners and a plurality of rods that are positioned in the recesses between respective engaged ones of the corners, wherein each of the rods is a cylinder having a single cylindrical wall, the cylindrical wall of each of the rods contacting at least two recesses associated with at least two of the tubes;

each engaged corner of the first and second ones of the tubes being formed from an intersection of a first sidewall and a second sidewall, the first and second side walls being normal to each other;

the first sidewall of the first one of the tubes and the first sidewall of the second one of the tubes being in substantial alignment; and

the second sidewall of the first one of the tubes and the second sidewall of the second one of the tubes being in substantial alignment.

With respect to claim 1, the Office Action states as follows:

Loftis discloses a container for storing or transporting spent nuclear fuel (title, abstract, column 1, lines 17+, column 2, lines 38+), the container comprising: a plurality of tubes that receive spent nuclear fuel assemblies, each tube having four sidewalls and four corners defining a rectangular cross section (cells C1-C15 in FIG. 1, 3, column 2, lines 37+, column 3, lines 48+); an attachment means (section [0005], lines 6+) for attaching respective pairs of a plurality of corners of the tubes to each other, at least one corner of a first one of the tubes engaging another corner of a second one of the tubes (rod segments 5 in FIG. 1, 2, column 3, lines 47+, column 4, lines 1+), each engaged corner of the first and second ones of the tubes being formed from an intersection of a first sidewall and a second sidewall, the first and second side walls being normal to each other (FIG. 1, column 3, lines 47+, column 4, lines 1+); the first sidewall of the first one of the tubes and the first sidewall of the second one of the tubes being in substantial alignment; and the second sidewall of the first one of the tubes and the second sidewall of the second one of the tubes being in substantial alignment (FIG. 1, column 3, lines 47+, column 4, lines 1+).

Loftis does not teach the limitation: the attachment means comprising a plurality of recesses in respective ones of the corners and plurality of rods that are positioned in the recesses between respective engaged ones of the corners.

However, it would have been obvious to a person of ordinary skill in the art at the time the invention was made to include said limitation in view of Mishallet drawn to a container for spent fuel storage, hence analogous art and solving similar problem who teaches a joint for attachment (*sic*) an elongated compartments with using of recesses (semi-cylindrical grooves 42, 43 in FIG. 6, 47, 48 in FIG. 7) and the rod (looking *sic* pin 50 in FIG. 2-7; pages 2, lines 5+ *sic*; page 6, lines 20+). It is obvious for ordinary skill in the art to modify the welding attachment of Loftis by attachment of Mishallet to simplify attachment. Said type of attachment is convenient and very common in mechanical art to use such recesses and pins for precise positioning and convenient connection of parts of system.

Motivation for said modification derives from Mishallet: A problem encountered in the construction of such containers concerns the joining together of the parts..." page 1, lines 12+

Loftis and Mishallet do not teach the specific means of attaching as disclosed in the Specification, which, under 35 USC 112, sixth paragraph, is interpreted to comprise also pins, nor do they directly teach the limitation: "wherein each of the rods is a cylinder having a single cylindrical wall" and "the cylindrical wall of each of the rods contacting at least two recesses associated with at least two of the tubes".

However, it would have been obvious to a person of ordinary skill in the art at the time the invention was made to include said limitation in view of Hoover drawn to a strong attachment of heavy load parts, hence analogous art because solved similar problem who teaches: cylinders 1 ("rods"), recesses 2 and 3, pin 4 in FIG. 1 on page 3. It is obvious and very common in mechanical art to use such recesses for precise positioning and convenient connection of rods or cylinders to the convex cylindrical surfaces of corners. An attachment means for attaching respective pairs of a plurality of corners of the tubes to each other in this claim is no more than a description of the commonplace hinge, having a barrel comprised by two knuckles, each knuckle extending from a separate leaf, where the leaf consists of the sidewall of one of the adjacent tubes. This type of structural connection is notoriously well known.

Motivation for said modification derives from Mishallet: A problem encountered in the construction of such containers concerns the joining together of the parts..." page 1, lines 12+).

Claim is obvious because known work in one field endeavor may prompt variations of it for use in either the same field or a different one based on design incentives or other market forces if the variations are predictable to one skilled in the art (MPEP 2143).

Office Action, pages 11-13.

Applicants note that the above quoted reasoning of the Office Action in rejecting claims 1, 3-6, 7 and 69-71 varies from the previous Office Action of April 29, 2008 only with respect to the newly cited *Minshallet* reference. Accordingly, with respect to the *Loffis* and *Hoover* references, Applicants applicants re-allege and reiterate statements concerning these references made in the response to the Office Action of April 29, 2008 in order to preserve those arguments for appeal. With respect to the newly cited *Minshallet* reference, Applicants respectfully disagree with the above quoted contentions of the Office Action.

In particular the *Minshallet* reference discloses a plurality of plates (5a, 5b, 6a, 6b, *etc.*) arranged in a perpendicular arrangement that form a cavity therein. Accordingly, the reference fails to disclose a tube structure in which it is possible to have a continuous inner sidewall as disclosed in the pending claims. See at least reference numerals 2 and 4, FIG. 5 of the instant application. In contrast, the *Minshallet* reference does not disclose a tube structure of any kind that has a continuous inner sidewall. Instead, it discloses a collection of horizontal wall plates.

In addition, *Minshallet* fails to disclose rods having openings that are recessed into the sidewall of a tube structure. Instead, the reference discloses multiple plates arranged perpendicularly that have interlocking tabs **extending from each end**. In contrast, the claimed invention claims rods having openings that are mounted in a recess of a tube structure. Because of the recesses **in the exterior sidewall** that are employed in the claimed invention, spent nuclear fuel in adjacent tubes can be stored in closer proximity. Therefore, employment of rods **in recesses** results in increased

storage capacity. In addition, tubes of the design of the claimed invention have a continuous interior sidewall as opposed to the storage compartment made of individual wall plates arranged perpendicularly.

Applicants also submit that a design according to the claimed invention yields greater flexibility in terms of the cross sectional shapes that can be adopted for tubes in which nuclear fuel assemblies are disposed. As noted in paragraph 24 of the instant application, the elongated tubes employed by the claimed invention can be arranged to form a square-like or rectangular-like cross section. In addition, the tubes can be arranged to form other cross-sectional shapes, e.g., circle, triangle, heptagon, hexagon and octagon. Applicants submit that the horizontal wall plates that perpendicularly arranged as in *Minshallet* fail to yield a similar result, as there does not appear to be any other way to arrange the plates to form any other cross-sectional shape other than a rectangular-like or square-like shape. In addition, Applicants respectfully assert that the combination of the *Loftis* reference with *Minshallet* is improper, as the wall plates employed by *Minshallet* would be incompatible with the tabs 22, 24 and connector arms 28, 30 employed in the cell housings of the *Loftis* reference. In other words, the connector tabs extending from the horizontal wall plates of *Minshallet* would be incompatible with the square-like cell housings disclosed in the *Loftis* reference.

Therefore, for at least the above reasons, we submit that the pending claims are allowable, contrary to the assertions of the Office Action. Accordingly, in view of the forgoing, Applicants assert that the rejection of claim 1 is improper and must be withdrawn. In addition, Applicants assert that the rejection of claims 3-6 and 7 must be withdrawn as depending from claim 1.

Independent claim 69, as amended, recites:

69. An apparatus for the dry storage and transport of spent nuclear fuel, comprising:
a plurality of tubes disposed in a container, ***each of the plurality of tubes having a continuous inner sidewall;***
a plurality of recesses, each recess being formed in a wall of a respective one of the tubes;
a plurality of rods, each rod being disposed within a first one of the recesses formed in a first one of the tubes;
each of the rods has an outer wall that contacts a second one of recesses formed in a second one of the tubes when the tubes are assembled in the container; and
each of the recesses being configured to receive the rod from a lateral direction with respect to a longitudinal length of a respective one of the tubes to facilitate a horizontal assembly of the tubes to each other.

With respect to claim 69, the Office Action applies the same reasoning in rejecting the claim as noted above in reference to claim 1. Accordingly, with respect to the *Loftis* and *Hoover* references, Applicants applicants re-allege and reiterate statements concerning these references made in the response to the Office Action of April 29, 2008 in order to preserve those arguments for appeal. With respect to the newly cited *Minshallet* reference, Applicants respectfully disagree with the above quoted contentions of the Office Action.

In particular the *Minshallet* reference discloses a plurality of plates (5a, 5b, 6a, 6b, *etc.*) arranged in a perpendicular arrangement that form a cavity therein. Accordingly, the reference fails to disclose a tube structure in which it is possible to have a continuous inner sidewall as disclosed in the pending claims. See at least reference numerals 2 and 4, FIG. 5 of the instant application. In contrast, the *Minshallet* reference does not disclose a tube structure of any kind that has a continuous inner sidewall. Instead, it discloses a collection of horizontal wall plates.

In addition, *Minshallet* fails to disclose rods having openings that are recessed into the sidewall of a tube structure. Instead, the reference discloses multiple plates arranged perpendicularly that have interlocking tabs **extending from each end**. In contrast, the claimed invention claims rods having openings that are mounted in a recess of a tube structure. Because of the recesses **in the exterior sidewall** that are employed in the claimed invention, spent nuclear fuel in adjacent tubes can be stored in closer proximity. Therefore, employment of rods **in recesses** results in increased storage capacity. In addition, tubes of the design of the claimed invention have a continuous interior sidewall as opposed to the storage compartment made of individual wall plates arranged perpendicularly.

Applicants also submit that a design according to the claimed invention yields greater flexibility in terms of the cross sectional shapes that can be adopted for tubes in which nuclear fuel assemblies are disposed. As noted in paragraph 24 of the instant application, the elongated tubes employed by the claimed invention can be arranged to form a square-like or rectangular-like cross section. In addition, the tubes can be arranged to form other cross-sectional shapes, e.g., circle, triangle, heptagon, hexagon and octagon. Applicants submit that the horizontal wall plates that perpendicularly arranged as in *Minshallet* fail to yield a similar result, as there does not appear to be any other way to arrange the plates to form any other cross-sectional shape other than a rectangular-like or square-like shape. In addition, Applicants respectfully assert that the combination of the *Loftis* reference with *Minshallet* is improper, as the wall plates employed by *Minshallet* would be incompatible with the tabs 22, 24 and connector arms 28, 30 employed in the cell housings of the *Loftis* reference. In other words, the

connector tabs extending from the horizontal wall plates of *Minshallet* would be incompatible with the square-like cell housings disclosed in the *Loftis* reference.

Therefore, for at least the above reasons, we submit that the pending claims are allowable, contrary to the assertions of the Office Action. Accordingly, in view of the forgoing, Applicants assert that the rejection of claim 69 is improper and must be withdrawn. In addition, Applicants assert that the rejection of claims 70-71 must be withdrawn as depending from claim 69.

VIII. REJECTION OF CLAIMS 8-10, 13-34, 48-51, and 53-58 AS ALLEGEDLY BEING UNPATENTABLE UNDER 35 U.S.C. § 103(a) OVER THE COMBINATION OF LOFTIS, MINSHALLET, BOSSHARD, LINDSAY, AND HOOVER FENCE

Next, in item 18 of the Office Action, claims 8-10, 13-34, 48-51, and 53-58 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Loftis* in view of *Minshallet*, in view of *Bosshard*, in view of *Lindsay*, and further in view of *Hoover Fence*. A prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the claims. MPEP §2143.03, In re Rijckaert, 9 F.3d 1531, 28 U.S.P.Q2d 1955, 1956 (Fed. Cir. 1993). In addition to the fact that such rejection is improper due to the fact that *Lindsay* and *Hoover Fence* are nonanalogous, Applicants additionally assert that the cited combination of references fail to show or suggest each of the elements of the above identified claims. Applicants reiterate and re-allege the statements made in the Office Action of April 29, 2008 regarding the various references cited in rejecting the claims. Applicants also note that the newly cited *Minshallet* reference fails to remedy the deficiencies of the previously cited art for at least the reasons noted above in reference to claims 1 and 69.

Accordingly, Applicants respectfully request that the rejection of these claims be withdrawn.

Accordingly, Applicants respectfully request that the rejection of the above noted claims in view of the combination of *Loftis*, *Minshallet*, *Bosshard*, *Lindsay*, and *Hoover* be withdrawn. In addition, Applicants request that the rejection of claims 8, 18, 28, and 48 as amended be withdrawn for reasons similar in scope with that described with respect to claims 1 and 69 above to the extent applicable. Also, Applicants request that the rejection of claims 9-10, 13-17, 19-27, 29-34, 49-51, and 53-58 be withdrawn as depending from claims 8, 18, 28, or 48.

CONCLUSION

It is requested that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding this Response, the Examiner is encouraged to telephone the undersigned counsel of Applicants.

Respectfully submitted,

/arr/

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